

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

DWAYNE KINTE ROBERTSON,

Plaintiff,

-against-

OFFICER MATTHEW SULLIVAN, Shield
#29723; OFFICER NILES PRINCE, Shield
#22353; and SERGEANT DIMITRI DAGLAS,
Shield #01647,

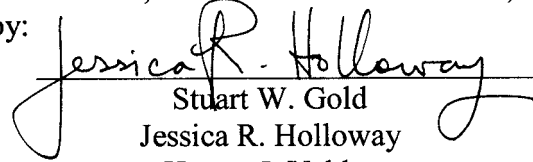
Defendants.

07 CV 1416 (JG)(LB)

**PLAINTIFF'S PROPOSED
VOIR DIRE QUESTIONS**

Pursuant to the Court's individual practices, Plaintiff Dwayne Robertson respectfully submits the following list of proposed questions for prospective jurors.

CRAVATH, SWAINE & MOORE LLP,
by:


Stuart W. Gold
Jessica R. Holloway
Hector J. Valdes

Worldwide Plaza
825 Eighth Ave.
New York, NY 10004
(212) 474-1000
Attorneys for the Plaintiff

Dated: February 25, 2010

Proposed Questions

1. Please tell us about your work experience, beginning with who you work for now and what your job is.
2. Where are the other members of your immediate family employed?
3. How many years of formal education do you have?
4. Were you ever in the military?
 - a. What ranks did you hold?
 - b. What duties did you have?
 - c. Were you ever in the military police?
5. Have you ever served on a jury before? If so, please identify the location and nature of the case or cases on which you served. Was it civil or criminal? What was the outcome?
6. Have you or has any member of your household, ever been a party to a lawsuit? If so, please explain.
7. Do you know anyone currently or previously employed by Cravath Swaine & Moore LLP or the New York City Law Department?
8. Do you know Stuart Gold, Jessica Holloway, Hector Valdes, Gabriel Harvis, Jeffrey Brooks? If so, please explain.
9. Do you have any opinions concerning the New York City Police Department?
 - a. What are they?
10. Have you or any member of your family or a close friend ever been the victim of a crime?
 - a. What was the nature of the crime?
 - b. Was the perpetrator punished?
 - c. What was the result?
 - d. Were you satisfied with the results?
11. Have you or has any member of your immediate family ever held any job in (a) a law enforcement agency, (b) any government agency, (c) the state or local police, (d) the FBI, (e) any prosecutor's office, (f) probation or parole agency or (g) a private detective or security guard agency?

12. Have any of your neighbors, friends or relatives ever held a job in (a) a law enforcement agency, (b) any government agency, (d) the state or local police, (d) the FBI, (e) any prosecutor's office, (f) probation or parole agency or (g) a private detective or security guard agency?
13. Does your job cause you to work with any law enforcement officer or agency?
14. Other than in self defense, do you believe it is ever appropriate for a police officer to (a) hit a civilian or (b) use physical force against a suspect?
15. If a civilian and a police officer give conflicting testimony about the same incident, would you be inclined to believe the police officer over the civilian and why?
16. Would the fact that someone had been convicted of a crime make you less likely to believe that person?
17. This is a case in which a man has sued three New York City police officers alleging civil rights violations. Would you have any difficulty being completely fair and impartial in such a case? If so, please explain in the absence of the other members of the panel.
18. Would you have any difficulty returning a verdict in favor of a person who could prove excessive force was used against him by a police officer?
19. Do you have feelings or believe that lawsuits are not the proper way for someone to seek compensation for an injury they believe was caused by someone else?
20. Do you believe that you could not, for whatever reason, place a dollar value on Mr. Robertson's injuries, including injuries for pain and suffering, emotional and physical damages, even though the evidence and the law may support that he be compensated for those items?
21. Would you have any trouble awarding damages not just to compensate a person for injuries, but to punish a police officer who abused his authority?
22. Do you have a maximum sum of money that you would never exceed in an award to Mr. Robertson even if the evidence and the law to be applied support a larger amount of money?
23. Do you believe that a person diagnosed with schizophrenia can tell the truth?¹

¹ Plaintiff may withdraw his proposed questions 16 and 23 depending on the Court's rulings regarding Plaintiff's and Defendants' motions in limine.